

NOTICE OF OBJECTION TO CONFIRMATION

LAKEVIEW LOAN SERVICING, LLC has filed papers with the Court to object to the Confirmation of the Chapter 13 Modified Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to object to the Confirmation of the Chapter 13 Modified Plan, or if you want the Court to consider your views on the Objection, then on or before, you or your attorney must:

1. File with the Court an answer, explaining your position at:

**Clerk
U.S. Bankruptcy Court
401 Market Street, 2nd Floor
Camden, NJ 08101**

If you mail your response to the Court for filing, you must mail it early enough so that the Court will *receive* it on or before the date stated above.

You must also mail a copy to:

Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103

Isabel C. Balboa, Trustee
Cherry Tree Corporate Cen, 535 Route 38 - Suite 580
Cherry Hill, NJ 08002

2. Attend the hearing scheduled to be held on 03/13/2019 in the CAMDEN Bankruptcy Court, at the following address:

**U.S. Bankruptcy Court
401 Market Street, 2nd Floor
Camden, NJ 08101**

If you or your attorney do not make these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an Order granting that relief.

Date: January 31, 2019

/s/ Robert J. Davidow
Robert J. Davidow, Esq.
Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
Tel: 856-813-5500 Ext. 47960
Fax: 856-813-5501
Email: Robert.Davidow@phelanhallinan.com

File No. 820833

Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard
Philadelphia, PA 19103
856-813-5500
FAX Number 856-813-5501
LAKEVIEW LOAN SERVICING, LLC

In Re:

NELSON I. ANTONIO A/K/A
PEDRO I. ANTONIO

Debtor

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

Chapter 13

Case No. 19-10706 - ABA

Hearing Date: 03/13/2019

The undersigned, Phelan Hallinan Diamond & Jones, PC, attorneys for Secured Creditor, LAKEVIEW LOAN SERVICING, LLC, the holder of a Mortgage on Debtor's residence located at 14 KAY LANE, SICKLERVILLE, NJ 08081-9734 hereby objects to the Confirmation of the Debtor's proposed Chapter 13 Modified Plan on the following grounds:

1. Movant is LAKEVIEW LOAN SERVICING, LLC.
2. Debtor, NELSON I. ANTONIO A/K/A PEDRO I. ANTONIO is the owner of the property located at 14 KAY LANE, SICKLERVILLE, NJ 08081-9734.
3. Movant is in the process of drafting and filing a Proof of Claim. The approximate arrears are \$36,690.49.
4. Debtor's Modified Plan fails to cure the delinquency pursuant to 11 U.S.C. §1322(b)(5).
5. Debtor's Modified Plan currently provides for payment to Movant in the amount of \$27,454.00.
6. Movant objects to Debtor's Modified Plan as it is underfunded. Debtor's Modified Plan should be amended to fully fund the arrears owed to Movant. Confirmation of Debtor's proposed Modified Plan should be denied.

WHEREFORE, LAKEVIEW LOAN SERVICING, LLC respectfully requests that the Confirmation of Debtor's Modified Plan be denied.

/s/ Robert J. Davidow

Robert J. Davidow, Esq.

Phelan Hallinan Diamond & Jones, PC

1617 JFK Boulevard, Suite 1400

Philadelphia, PA 19103

Tel: 856-813-5500 Ext. 47960

Fax: 856-813-5501

Email: Robert.Davidow@phelanhallinan.com

Dated: January 31, 2019

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

820833
Phelan Hallinan Diamond & Jones, PC
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103
856-813-5500
Attorneys for LAKEVIEW LOAN SERVICING, LLC

In Re:

Nelson I. Antonio A/k/a Pedro I. Antonio

Case No: 19-10706 - ABA

Hearing Date: 03/13/2019

Judge: Andrew B. Altenburg, Jr

Chapter: 13

CERTIFICATION OF SERVICE

1. I, Jason Seidman:

☐ represent the _____ in the above-captioned matter.

☒ am the secretary/paralegal for Phelan Hallinan Diamond & Jones, PC, who represents LAKEVIEW LOAN SERVICING, LLC in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On January 31, 2019 I sent a copy of the following pleadings and/or documents to the parties listed below:

Objection to Modified Plan

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: January 31, 2019

/s/ Jason Seidman
Jason Seidman

| Name and Address of Party Served | Relationship of Party to the Case | Mode of Service |
|--|-----------------------------------|---|
| Nelson I. Antonio 14 Kay Lane, Sicklerville, NJ 08081-9734 | Debtor | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *) |
| U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102 | Trustee | <input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *) |
| Brad J Sadek, Esquire 1315 Walnut Street Ste 502 Philadelphia, PA 19107 | Debtor's Attorney | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *) |
| Isabel C. Balboa, Trustee Cherry Tree Corporate Cen 535 Route 38 - Suite 580 Cherry Hill, NJ 08002 | Trustee | <input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *) |

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.